



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
KNOXVILLE ENVIRONMENTAL FIELD OFFICE  
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May 16, 2014

The Honorable Terry Frank  
Mayor, Anderson County  
100 N. Main Street  
Clinton, Tennessee 37716

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**RECEIPT # 70111570000088747008**

RE: Compliance Review Meeting Summary  
Anderson County MS4  
NPDES Permit No. TNS075108  
Anderson County

Dear Mayor Frank:

The Compliance Review Meeting held on May 7, 2014, was conducted to discuss Anderson County's Municipal Separate Storm Sewer System (MS4) program and compliance with NPDES Permit Number TNS075108. Michael Atchley, Shari Winburn, and I, from the Division of Water Resources, met with you to discuss program deficiencies, compliance strategies, ordinance revisions, and compliance deadlines.

During the meeting, consultants from GEOServices, LLC submitted a proposed compliance timeline (attached) which addresses the primary program deficiencies outlined in the Notice of Violation issued to Anderson County and dated April 15, 2014. However, the approved compliance schedule has been modified to meet the following timeframe:

<u>Objective:</u>	<u>Completion Date:</u>
First Reading of Stormwater Ordinance	June 16, 2014
2013 Annual Report Submission	June 30, 2014
Develop Enforcement Response Plan	June 30, 2014
Final Approval Stormwater Ordinance	July 21, 2014
Enact Formal Stormwater Management Plan	September 1, 2014
Develop Monitoring Program	September 1, 2014
Establish Standard Operating Procedures	September 1, 2014

The Division appreciates the cooperation of Anderson County officials and the consultants in reaching the agreed terms of this compliance schedule. The Division recognizes both the difficulties of restructuring a stormwater program, as well as the need to gain compliance with NPDES Permit Number TNS075108.

The Honorable Terry Frank  
Anderson County  
May 16, 2014

Again, the Division appreciates the cooperation shown during the MS4 inspection and the Compliance Review Meeting. If you have any questions or comments, feel free to contact me at (865) 594-1077 or [Jason.Mann@tn.gov](mailto:Jason.Mann@tn.gov).

Sincerely,

A handwritten signature in blue ink that reads "Jason Mann". The signature is fluid and cursive, with the first name "Jason" and last name "Mann" clearly distinguishable.

Jason Mann,  
Tennessee Division of Water Resources

Attachment: Proposed Compliance Schedule

cc: Richard Burroughs, Anderson County (e-copy)  
Byron Barton, GEOServices, LLC (e-copy)  
Ben Claxton, GEOServices, LLC (e-copy)  
Brian Chomicki, GEOServices, LLC (e-copy)



May 7, 2014

The Honorable Terry Frank  
Mayor, Anderson County  
100 N. Main Street  
Clinton, TN 37716

Attention: Mr. Jason Mann  
[Jason.Mann@tn.gov](mailto:Jason.Mann@tn.gov)

Subject: **MS4 Program Audit – Notice of Violation**  
NPDES Permit No. TNS075108  
Anderson County, Tennessee  
GEOServices Project No. 24-14163

Dear Mr. Mann:

GEOServices, LLC appreciates the opportunity to provide you with our compliance timeline for the Anderson County MS4 NPDES Permit. This proposal provides a general description of the project, the proposed schedule to achieve compliance.

## **BACKGROUND**

Anderson County was subject to a special election after the former mayor Rex Lynch resigned his unexpired term in January 2011. A new administration was elected to office in August 2012, as a result of the special election. The previous stormwater management employees left their positions after the 2012 election, leaving the Stormwater Program unstaffed. Since the 2012 election, the current administration has been working to meet the standards of the NPDES Permit (TNS075108). The NPDES permit Notice of Coverage was issued on May 20, 2011. A stormwater management plan, Enforcement Response Plan were drafted but never approved and the last annual report was submitted in September 2012.

The following table details a proposed timeline of objectives to achieve permit compliance. Adjustments from the original timeline are proposed to satisfy the milestones set forth in the NOI.

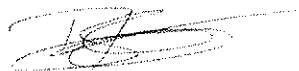
**PROPOSED TIMELINE**

<b>Objective</b>	<b>Actions Needed</b>	<b>Completion Date</b>
Storm Water Ordinance	Revise the Ordinance to address the deficiencies noted in the 4/15/14 NOV	6/16/14: Full Commission Meeting
2013 Annual Report	Itemize and detail deficiencies from the prior year(s). Reorganize milestone years to address previous year's deficiencies.	6/30/14
Stormwater Management Plan	Public Education & Participation*	9/1/2014
	Illicit Discharge Detection and Elimination*	
	Construction Site Stormwater Runoff Program*	
	Permanent Stormwater Management*	
	Pollution Prevention/Good Housekeeping for Municipal Operations*	
Enforcement Response Plan	Outline enforcement actions that will be employed by the Storm Water department to insure compliance with current requirements specified in the TDED NPDES Permit for Discharges from Small MS4s and the Tennessee CGP (TNR100000)	6/30/14
Standard Operating Procedures	Develop SOPs in a separate document from the Ordinance to aid stormwater staff and consistently implement the program.	9/1/2014
Monitoring Plan	Develop a comprehensive monitoring plan with visual stream assessments, biological sampling, and chemical monitoring of impaired streams within the jurisdiction.	9/1/2014

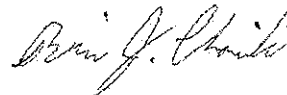
\*Additional details are listed in the subsequent tables.

Deficiencies in the annual report have resulted in revised milestones for the subsequent, 2014-2015, year(s). These revised milestone objectives will be shown in the approved Stormwater Management Plan. If you have any questions related to this report please do not hesitate to contact our office at (865) 539-8242.

Sincerely,  
**GEOservices, LLC**



Byron L. Barton, P.G.  
Environmental Department Manager



Brian Chomicki, M.S.  
Environmental Scientist